REMARKS

In response to the Examiner's comments regarding the Information Disclosure Statement, Applicants supply herewith an IDS and a copy of the WO0075812A reference.

Claims 1, 2, 5-10 and 13-18 are currently pending in the patent application. The Examiner has rejected Claims 1-2, 5-6, 9-10, 13-14, and 17-18 under 35 USC 102(e) as anticipated by Khan; Claims 1-2, 5, 9-10, 13 and 17-18 as anticipated by Dumbill; Claim 7 under 35 USC § 103(a) as being unpatentable over Khan in view of Black; Claim 8 under 35 USC 103 (a) as being unpatentable over Khan in view of Black and Official Notice; Claim 15 under 35 USC § 103(a) as being unpatentable over Khan in view of Black; and, Claim 16 under 35 USC 103 (a) as being unpatentable over Khan in view of Black and Official Notice. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are patentable over the cited prior art.

The present invention teaches a computer-based method and program storage device for implementing the method for providing information between a plurality of nodes coupled to a communication network wherein the plurality of nodes comprises more than one content provider nodes, at least one

user node, and a portal node between said content providers and said at least one user node, without the portal having to re-format or "translate" every communication from the format provided by the content providers to the format required by the user. The method comprises the steps of receiving, at the portal node, information from multiple content provider nodes having multiple different portlets, wherein the information has been generated in a markup language using a specific portlet at each of the more than one content provider nodes; combining, at the portal node, the received information using a generic portlet; and sending, from the portal node, the combined information to a user node. In addition, the present application recites the method and program storage device for each content provider node to provide the information in a markup language using a specific portlet wherein the information is to be combined, using a generic portlet at the portal, with information having been sent by other content providers using different specific portlets.

The term "portlet", is described in the Specification on page 3 as a "content-specific application that runs on a portal". A portlet is not a portal, but is the application which runs on a portal. Applicants respectfully contend

that the Examiner is still using the terms "portal" and "portlet" interchangeably in the Office Action; and, as a result, the Examiner has incorrectly interpreted the claim language and its relationship to the teachings of the prior art, as further discussed below with reference to the Khan reference.

Applicants also note that the Dumbill reference uses the word "portlet", but that Dumbill provides a different definition of the term "portlet". As taught in Dumbill on the second page of the printout, "boxes of headlines on the front page are, in fact, the representations of so-called *portlets*--information chunks imported into Jetspeed." Clearly what Dumbill is describing as a portlet is different from the portlet which is defined and claimed for the present invention.

Applicants respectfully remind the Examiner that an applicant for patent is encouraged to be his or her own lexicographer to explicitly describe and delineate the metes and bounds of the claimed invention so that one having skill in the art would understand how to practice the invention, and what is covered by the patent. Since Applicants clearly define the term "portlet", their use of the term is unambiguous, regardless of the fact that Dumbill uses the

term to mean something different, as further discussed below.

The Khan patent, which has been cited as the primary reference against all of the claims, teaches a bookmarking system and method whereby a user can designate a "bookmark" by input at the user site. When a user chooses to bookmark a remote computer location, such as a content provider site, the bookmark server stores information for linking the user to the linked web site. Khan teaches that a customizable bookmark portal page is created for the user at the server. The portal page includes programmable bookmarks which can be customized by the user and subsequently selected by the user for access to the web sites listed therein. When a user wishes to access a bookmarked site, the user will first contact the server, access the bookmark portal page, and then select one of the user's bookmark entries from the portal page. The server can also provide the service of scanning the sites listed on the user's bookmark portal page for updates, and push updated content to the user. The Examiner has concluded that Khan anticipates the claim language since Khan lists URLs for multiple sites on a single user's bookmark portal page.

Applicants respectfully assert that the Khan patent does not teach or suggest the invention as claimed. The Khan patent does not teach means for or a step of receiving, at a portal node, user-requested content information from more than one content provider nodes, wherein the user-requested content information has been generated in a markup language using different specific portlets at each of the more than one content provider nodes. Khan teaches that the server lists URLs for accessing content provider nodes, and can additionally provide a feature for content delivery to a user. However, Khan does not teach or suggest that information has been generated by a specific portlet at the content providers. Applicants further assert that Khan does not teach or suggest combining, at the portal node, the received user-requested content information using a generic portlet. Finally, the Khan patent does not teach or suggest sending, from the portal node, the combined user-requested content information, generated using the generic portlet, to a user node. As such, Applicants conclude that the language of Claims 1-8 and 17 is not anticipated by Khan.

Anticipation under 35 USC 102 is established only when a single prior art reference discloses each and every element of a claimed invention. See: In re Schreiber, 128

F. 3d 1473, 1477, 44 USPQ2d 1429, 1431 (Fed. Cir. 1997); In re Paulsen, 30 F. 3d 1475, 1478-1479, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994); In re Spada, 911 F. 2d 705, 708, 15 USPQ2d 1655, 1657 (Fed. Cir. 1990) and RCA Corp. v. Applied Digital Data Sys., Inc., 730 F. 2d 1440, 1444, 221 USPQ 385, 388 (Fed. Cir. 1984). Since Khan does not teach every claim feature, the anticipation rejection cannot be sustained.

With respect to the language of Claims 9-16 and 18, Khan does not teach the steps of generating, within at least one content provider node, user-requested content information in a markup language using a specific portlet and sending, from the at least one content provider node, the generated information to a portal node for combining with information in the markup language received from other content provider nodes and sending the information to a user node using a generic portlet. As discussed above, the Khan patent does not teach provision of user-requested content from content providers wherein the content has been generated using specific portlets at the content providers. Also, Khan does not teach sending generated information to a portal node for combining, using a generic portlet, with information generated at other content provider nodes.

Applicants also contend that the Dumbill reference does
nto anticipate the invention as claimed. Dumbill provides
the author's analysis of Jetspeed, a product for providing a
gateway to multiple information resources. According to
Dumbill, Jetspeed gathers "information chunks imported into
Jetspeed" (i.e., the Dumbill "portlets") into a database and
presents them to the user. As stated above, Dumbill
provides a different definintion of the term "portlet" than
does the present application. The term "portlet", as
described in the present Specification on page 3 is a
"content-specific application that runs on a portal". An
information chunk imported into Jetspeed is not a
content-specific application that runs on a portal. There
is nothing in the Dumbill article that either teaches or
suggests multiple different specific portlets (i.e.,
content-specific applications) at different content provider
nodes, let alone the steps and means for generating
user-requested content at content providers wherein the
content   is   generated   using   specific
portlets/content-specific applications at the content
providers, sending generated information to a portal node
for combining, using a generic portlet, with information

generated at other content provider nodes, and sending the combined user-requested content information to a user node.

For a patent to anticipate another invention under 35 USC § 102, the patent must clearly teach each and every claimed feature. Since the Khan patent does not teach a portal node between content provider nodes and user nodes, the content provider nodes generating user-requested content information in a markup language using a specific portlet, the content provider nodes sending the generated user-requested content information to the portal node, the portal node combining the received information from multiple content providers and the portal node sending the combined information to the user node, it cannot be maintained that the Khan patent anticipates each and every claim feature. Similarly, since the Dumbill article provides a different definition of "portlet" and does not teach content provider nodes generating user-requested content information in a markup language using different specific portlets, the content provider nodes sending the generated user-requested content information to a portal node, the portal node combining the received information from multiple content providers using a generic portlet, and the portal node sending the combined information to the user node, it cannot

be maintained that the Dumbill anticipates each and every claim feature. In light of the fact that neither the Khan patent nor the Dumbill article shows each and every feature of the claimed invention, Applicants respectfully request that the rejections based on 35 USC § 102 be withdrawn.

The Examiner has additionally rejected claims based on a combination of Khan with Black, or Khan with Black and Official Notice. The Applicants rely on the arguments presented above with respect to the Khan patent teachings. Moreover, Applicants respectfully assert that neither the Black patent nor the information of which the Examiner takes Official Notice provides those teachings which are missing from the Khan patent. The Black patent has been cited for teaching fees associated with content provision, which Applicants agree is well known. However, even if one were to modify Khan with the Black fees, one would not arrive at the invention as claimed, since neither Black nor Khan teaches a portal node between content provider nodes and user nodes, the content provider nodes generating user-requested content information in a markup language using a specific portlet, the content provider nodes sending the generated user-requested content information to the portal node, the portal node combining the received

information from multiple content providers using a generic portlet, and the portal node sending the combined information to the user node.

For a determination of obviousness, the prior art must teach or suggest all of the claim limitations. "All words in a claim must be considered in judging the patentability of that claim against the prior art" (In re Wilson, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970). If the cited references fail to teach each and every one of the claim limitations, a prima facie case of obviousness has not been established by the Examiner.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the claims, withdrawal of the rejections, and issuance of the claims.

Respectfully submitted,
T. F. Boehme, et al

By: Anne Vachon Dougherty
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910

Enclosures